

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
WILLIAM PATRICK MORRISON	:	CASE NO. 1:14-bk-00621
Debtor	:	
	:	CHAPTER 13
WELLS FARGO BANK, N.A.	:	
Movant	:	
	:	
v.	:	
	:	
WILLIAM PATRICK MORRISON	:	
JUDITH MORRISON (NON-FILING	:	
CO-DEBTOR)	:	
CHARLES J. DeHART, III (Trustee)	:	
Respondents	:	

DEBTOR'S RESPONSE TO MOTION OF
WELLS FARGO BANK, N.A.
FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, come Debtor, William Patrick Morris, by and through his attorney, Gary J.

Imblum, and respectfully respond as follows:

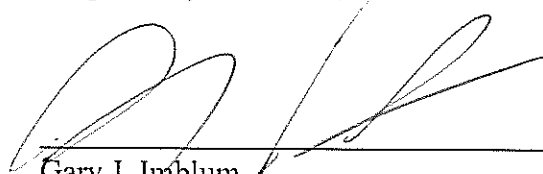
1. Admitted.
2. Admitted in part. The Debtor has no knowledge as to whether the Movant is the correct party in interest. Strict proof is demanded.
3. Admitted.
4. Admitted in part and denied in part. See response to paragraph 2.
5. Denied. In accordance with the market analysis conducted in 2014, the real estate is worth \$340,000.00. According to the Proof of Claim filed on behalf of the Movant, the amount owed as of the date of the filing of the Bankruptcy was \$221,922.31. Accordingly there is a significant equity cushion. Further, Debtor is providing adequate protection through regular monthly payments. To the extent that the

monthly payments are in arrears, Debtor will make an offer in the near future to bring same current.

6. Admitted.
7. Admitted in part and denied in part. It is admitted that Debtor is delinquent for the months for November 2016 to present. Debtor has received an offer to purchase the property in the amount of \$313,000.00 and a Motion for Sale of Property Free and Clear of Liens was filed on April 25, 2017. By way of further answer, Debtor's counsel has requested a payment history from counsel for Movant.
8. Denied. See response to paragraphs 5 and 7.
9. Denied. Movant should only communicate with Debtor directly through Debtor's counsel.
10. Denied. See response to paragraphs 5 and 7.
11. Denied. There is no reason why Rule 4001(a)(3) should not apply.

WHEREFORE, Debtor respectfully requests that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



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Attorney for Debtors

DATED: 5-8-17

CERTIFICATION OF SERVICE

I, Bernadette A. Davis, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO MOTION OF WELLS FARGO BANK, N.A. FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

CHARLES J DEHART III ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

dehartstaff@pamd13trustee.com

THOMAS SONG, ESQUIRE
COUNSEL FOR MOVANT
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.

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For Debtors

DATED: 5/9/17

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